

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2004-AC4 ASSET-BACKED CERTIFICATES, SERIES 2004-AC4 has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC	ALBERT RUSSO, Trustee
1617 JFK Boulevard, Suite 1400	CN 4853, SUITE 101
Philadelphia, PA 19103	TRENTON, NJ 08650

Attend the hearing scheduled to be held on 08/21/2019 in the TRENTON Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: July 26, 2019

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

File No. 827756

Phelan Hallinan Diamond & Jones, PC

1617 JFK Boulevard

Philadelphia, PA 19103

856-813-5500

FAX Number 856-813-5501

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BEAR STEARNS ASSET
BACKED SECURITIES I TRUST 2004-AC4 ASSET-BACKED CERTIFICATES, SERIES 2004-
AC4

In Re:

PATRICIA PUGLIESE A/K/A
PATRICIA A. URSO A/K/A
PATRICIA A. PUGLIESE A/K/A
PATRICIA A. WARDLOW

Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

Chapter 13

Case No. 14-24569 - CMG

Hearing Date: 08/21/2019

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2004-AC4 ASSET-BACKED CERTIFICATES, SERIES 2004-AC4, the holder of a Mortgage on debtors residence located at 505 WILLOW BOULEVARD, BROWNS MILLS, NJ 08015 hereby objects to the Confirmation of the debtors proposed Chapter 13 Plan on the following grounds:

1. On May 22, 2018, Movant filed an Amended Proof of Claim listing pre-petition arrears in the amount of \$41,316.75.
2. Debtors' Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
3. Debtors' Plan fails to provide for the correct current on-going, post-petition regular monthly mortgage payment amount. Movant objects to any amount less than 100% of what is required under the terms of the loan documents. Debtor's Modified plan provides for the monthly post-petition mortgage payment of \$1,047.99. Movant objects to the Post-

Petition mortgage payment as the actual payment amount is \$1,123.74 per the Notice of Mortgage Payment Change filed October 10, 2018.

4. Debtors' Plan should be amended to indicate the correct post-petition monthly payment amount as of the first post-petition payment date owed to Movant or Confirmation should be denied.

WHEREFORE, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2004-AC4 ASSET-BACKED CERTIFICATES, SERIES 2004-AC4 respectfully requests that the Confirmation of Debtors Plan be denied.

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

Dated: July 26, 2019

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

827756
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for U.S. BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR BEAR
STEARNS ASSET BACKED SECURITIES I TRUST
2004-AC4 ASSET-BACKED CERTIFICATES,
SERIES 2004-AC4

In Re:

Patricia Pugliese A/K/A Patricia A. Urso A/K/A
Patricia A. Pugliese A/K/A Patricia A. Wardlow

Case No: 14-24569 - CMG

Hearing Date: 08/21/2019

Judge: CHRISTINE M.
GRAVELLE

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Melissa Reiner:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2004-AC4 ASSET-BACKED CERTIFICATES, SERIES 2004-AC4 in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On July 26, 2019 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: July 26, 2019

/s/ Melissa Reiner
Melissa Reiner

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Patricia A. Urso 505 Willow Boulevard, Browns Mills, NJ 08015	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Christopher G. Cassie, Esquire 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Albert Russo, Trustee Cn 4853 Suite 101 Trenton, NJ 08650	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.